

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE FLINT WATER LITIGATION

Case No. 5:16-cv-10444-JEK-MKM

Hon. Judith E. Levy

This Document Relates To:

Gaddy et al. v. Flint et al.

Meeks et al. v. Flint et al.

Case No. 5:17-cv-11166-JEL-MKM

Case No. 5:17-cv-11165-JEL-MKM

**DECLARATION OF JAMES M. CAMPBELL IN SUPPORT
DEFENDANTS VEOLIA NORTH AMERICA, LLC, VEOLIA NORTH
AMERICA, INC., AND VEOLIA WATER NORTH AMERICA
OPERATING SERVICES, LLC'S MOTION TO EXCLUDE THE
TESTIMONY AND REPORT OF ROBERT A. MICHAELS, PH.D., CEP**

I, James M. Campbell, declare as follows:

1. I am a partner of the law firm of Campbell Conroy & O'Neil, P.C., and I represent Defendants Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC (collectively, VNA) in the above-captioned matter. I have personal knowledge of the matters stated in this Declaration.

2. Attached as Exhibit 2 is a true and correct copy of the Expert Report of Dr. Robert A. Michaels.

3. Attached as Exhibit 3 is a true and correct copy of the excerpts of the deposition of Dr. Robert A. Michaels.

4. Attached as Exhibit 4 is a true and correct copy of the Expert Report of Dr. Brent L. Finley.

5. Attached as Exhibit 5 is a true and correct copy of excerpts of the deposition of A.T's mother.

6. Attached as Exhibit 6 is a true and correct copy of excerpts of the deposition of E.S.'s mother.

7. Attached as Exhibit 7 is a true and correct copy of excerpts of the deposition of R.V.'s mother.

8. Attached as Exhibit 8 is a true and correct copy of excerpts of the deposition of D.W.'s mother.

9. Attached as Exhibit 9 is a true and correct copy of the Expert Report (E.S.) of Dr. William G. Bithoney.

10. Attached as Exhibit 10 is a true and correct copy of the Expert Report (R.V.) of Dr. William G. Bithoney.

11. Attached as Exhibit 11 is a true and correct copy of the Expert Report (D.W.) of Dr. William G. Bithoney.

12. Attached as Exhibit 12 is a true and correct copy of the Expert Report (E.S.) of Dr. Mira Krishnan.

13. Attached as Exhibit 13 is a true and correct copy of the Expert Report (R.V.) of Dr. Mira Krishnan.

14. Attached as Exhibit 14 is a true and correct copy of the Expert Report (D.W.) of Dr. Mira Krishnan.

15. Attached as Exhibit 15 is a true and correct copy of the Expert Report (E.S.) of Dr. John Gaitanis.

16. Attached as Exhibit 16 is a true and correct copy of the Expert Report (R.V.) of Dr. John Gaitanis.

17. Attached as Exhibit 17 is a true and correct copy of the Expert Report (D.W.) of Dr. John Gaitanis.

18. Attached as Exhibit 18 is a true and correct copy of an excerpt of the declaration of Clyde Edwards.

19. Attached as Exhibit 19 is a true and correct copy of an excerpt of the declaration of Tammy Phaneuf.

20. Attached as Exhibit 20 is a true and correct copy of Kelsey J. Pieper et al., *Evaluating Water Lead Levels During the Flint Water Crisis*, 52 Env'tl. Sci. & Tech. 8124 (2018).

21. Attached as Exhibit 21 is a true and correct copy of Siddhartha Roy, Min Tang, & Marc A. Edwards, *Lead Release to Potable Water During the Flint, Michigan Water Crisis as Revealed by Routine Biosolids Monitoring Data*, 160 Water Rsch. 475 (2019).

22. Attached as Exhibit 22 is a true and correct copy of Siddhartha Roy & Marc A. Edwards, *Efficacy of Corrosion Control and Pipe Replacement in Reducing Citywide Lead Exposure During the Flint, MI Water System Recovery*, 6 *Envtl. Sci.: Water Rsch. & Tech.* 3024 (2020).

23. Attached as Exhibit 23 is a true and correct copy of Mona Hanna-Attisha et al., *Elevated Blood Lead Levels in Children Associated with the Flint Drinking Water Crisis*, 106 *Am. J. Pub. Health* 283 (2016).

24. Attached as Exhibit 24 is a true and correct copy of H. Gomez et al., *Blood Lead Levels of Children in Flint, Michigan: 2006-2016*, 197 *J. Pediatrics* 158 (2018).

25. Attached as Exhibit 25 is a true and correct copy of H. Gomez et al., *Analysis of Blood Lead Levels of Young Children in Flint, Michigan Before and During the 18-Month Switch to Flint River Water*, 57 *Clinical Toxicology* 790 (2019).

26. Attached as Exhibit 26 is a true and correct copy of Ron Fonger, *Flint Pediatrician Who Blew the Whistle on Water Crisis Won't Recommend Bone Scans for Kids*, *Mlive* (Mar. 15, 2021).

27. Attached as Exhibit 27 is a true and correct copy of Ron Fonger, *Flint Mayor's Health Advisor Calls Water Settlement Bone Lead Testing "A Human Rights Violation," Mlive* (Mar. 1, 2021).

28. Attached as Exhibit 28 is a true and correct copy of excerpts of the deposition of Dr. Aaron Specht.

29. Attached as Exhibit 29 is a true and correct copy of excerpts of the deposition of Dr. Graziano.

30. Attached as Exhibit 30 is a true and correct copy of CDC, *Response to Advisory Committee on Childhood Lead Poisoning Prevention Recommendations* (2012).

31. Attached as Exhibit 31 is a true and correct copy of ATSDR, *Toxicological Profile for Lead* (Aug. 2020).

32. Attached as Exhibit 32 is a true and correct copy of the Expert Report of Dr. Douglas L. Weed.

33. Attached as Exhibit 33 is a true and correct copy of ATSDR, *Case Studies In Environmental Medicine (CSEM) Lead Toxicity* (June 12, 2017).

34. Attached as Exhibit 34 is a true and correct copy of H. Comm. on Oversight and Reform, Subcomm. on Econ. and Consumer Pol'y, *Baby Foods Are Tainted with Dangerous Levels of Arsenic, Lead, Cadmium, and Mercury* (Feb. 4, 2021).

35. Attached as Exhibit 35 is a true and correct copy of the Expert Report of Dr. Stacey M. Benson.

36. Attached as Exhibit 36 is a true and correct copy of the Expert Report (A.T.) of Dr. Mira Krishnan.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on May 11, 2021
Boston, Massachusetts

/s/ James M. Campbell
James M. Campbell